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10 **IN THE UNITED STATES BANKRUPTCY COURT**

11 **EASTERN DISTRICT OF CALIFORNIA**

12 **FRESNO DIVISION**

13 In re

14 CASE NO. 17-13797

15 TULARE LOCAL HEALTHCARE
16 DISTRICT, dba TULARE REGIONAL
17 MEDICAL CENTER,

18 Chapter 9

19 Debtor.

20 Date: August 15, 2019

21 Tax ID #: 94-6002897

22 Time: 9:30 a.m.

23 Address: 869 N. Cherry Street
24 Tulare, CA 93274

25 Place: 2500 Tulare Street
26 Fresno, CA 93721
27 Courtroom 13

28 Judge: Honorable René Lastreto II

19 **DECLARATION OF KEVIN B. NORTHCRAFT IN SUPPORT OF CONFIRMATION OF**
20 **PLAN FOR THE ADJUSTMENT OF DEBTS DATED AS OF APRIL 30, 2019**

21 1. My name is Kevin B. Northcraft. I am the elected President of the Board of Directors
22 of Tulare Local Healthcare District (the "District") located in Tulare, California.

23 2. In my capacity as President, I preside over a five (5) person publicly elected Board.
24 Each Director is elected by District.

25 3. I have been the President of the Board of Directors since prior to the decision to file
26 Chapter 9 on September 29, 2017. The Chapter 9 was filed on September 30, 2017 on an emergency
27 basis.

1 4. Since this Chapter 9 case was filed, I presided over numerous special meetings and
2 regular meetings involving all aspects of this case.

3 5. When the Chapter 9 case was filed the District was, essentially, out of cash. Since that
4 time, the District has clawed its way back to the point that it is now proposing a Plan of Adjustment.

5 6. During the pendency of this Chapter 9 case, the Board has worked closely with the
6 District's attorneys, both District's Counsel Todd Wynkoop, Benjamin Nicholson, and Jason Howard,
7 as well as Riley C. Walter as Bankruptcy Counsel. I believe that we have been well represented
8 throughout these proceedings and that we have been kept properly informed of both the Chapter 9
9 proceedings, matters involving the District and many other matters.

10 7. In my capacity as President and as a Director, I know that the Board has worked closely
11 with Riley C. Walter as to development of the Chapter 9 Plan of Adjustment.

12 8. We held several special meetings at which we discussed our options. We discussed the
13 Plan and Projections appended to the Plan at length and we heard from our auditor and consultants,
14 Richard Gianello and Dan Heckathorne.

15 9. I can report with confidence that the Plan of Adjustment that is before this court for
16 confirmation on August 15, 2019 was unanimously approved on a 5:0 vote and that I have signed the
17 Plan in my official capacity as President and consent to confirmation of the Plan.

18 10. While I understand that there has been no objection to confirmation of our Plan, I
19 nonetheless wish to inform the Court that the Board did carefully consider the interest of the District
20 and the interest of the creditors in crafting the Plan.

21 11. The Board was careful in making sure that the District would be able to continue to
22 maintain its facilities and provide a decent level of healthcare to the people of the District while creating
23 a fund for the payment of existing indebtedness and future indebtedness. I am gratified to know that
24 100% of the Class 8 creditors are voting to accept the Plan which is a testament to our sincere effort to
25 balance the competing needs of the District with our desire to pay unsecured creditors.

26 12. It is my belief and testimony that the District believes that the proposed Plan of
27 Adjustment has been proposed in good faith and not by any means forbidden by law.

13. I also believe that the Plan complies with applicable laws including the Bankruptcy Code and the California District Law.

I so declare and represent under penalty of perjury that the foregoing is true and correct.
Executed on August 8, 2019, at Tulare, California.


Kevin B. Northcraft

Kevin B. Northera